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ABSTRACT

The complex process of developing Individualized Education Programs (IEPs) and the placing of handicapped students is discussed. The IEP is developed by the school administrator, the child's teachers, and the child's parents. A model of an efficient system for implementing an IEP is described. The basis of the model is the collection and coding by trained data collectors of all written referral information, psychoeducational assessment reports, and IEP contents. The guiding body of the IEP implementation project is a steering committee comprised of a parent of a handicapped student, a special educator, a general educator, key administrative personnel, and the project director. A description is given of the way in which this steering committee, working from all available data, can successfully implement IEPs in a school system. (JD)

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Implementing the Individualized Education Program

through

Data Based Decision Making

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December 10, 1980

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Social policy influences practice through the daily activities of those organizational members responsible for applying and implementing it. Dominant policy themes of both Federal and State Special Education Regulations include: Due Process Procedural Safeguards, Protection in the Evaluation Process (PEP), the Individualized Education Program (IEP), and placement in the Least Restrictive Environment (LRE). Due Process and PEP are civil rights oriented themes and can be implemented largely through administrative action. Placement in the LRE should be determined on an individual student basis; it requires consideration of many factors. Developed in a meeting of a team, the individualized education program describes the specially designed instruction and related services which are responsive to the unique needs of the handicapped student. The IEP is difficult to implement as it requires alteration of many existing regularities.

Members of the team which develops the IEP are an administrator, the child's teacher(s), and the child's parents. The anticipated outcome of the team meeting is an individualized education program inclusive of the following content:

a. A statement of the child's present levels of educational performance;

b. A statement of annual goals, including short term instructional objectives;

c. A statement of the specific special education and related services to be provided to the child, and the extent to which the child will be able to participate in regular educational programs;

d. The projected dates for initiation of services and the anticipated duration of the services; and

e. Appropriate objective criteria and evaluation procedures and schedules for determining, on at least an annual basis, whether the short term instructional objectives are being achieved.

When viewed as both a process and a product the complexity of the individualized education program increases. Four key principles guide the IEP as a process: (1) internal consistency; (2) participatory planning; (3) cooperative use; (4) mutual supportiveness. "Internal consistency" is established within the referral, planning, placement, and programming process. It exists when the following questions are answered affirmatively:

1. Do assessment instruments and procedures employed provide information related to the reason(s) for referral?
2. Is the content of the individualized education program related to assessment results?
3. Do present level of performance statements identify those areas which require specially designed instruction?
4. Are present level of performance statements related to assessment results?
5. Is there an annual goal for each present level of performance statement?

6. Do annual goals identify anticipated outcomes of specially designed instruction?
7. Do short term instructional objectives identify intermediate points of student progress between present levels of performance and annual goals?
8. Does the content of individualized education programs vary by program placement prototype (i.e., resource program, self-contained class program, day program, residential program)?
9. Does the content of individualized education programs vary by chronological age group placement of students (i.e., preschool programs, elementary school programs, middle school programs, junior-senior high school programs)?

"Participatory planning" is the second principle of the IEP as a process. Participatory planning reflects the conviction that each person's efforts count for somthing in relation to one another and for the benefit of the handicapped child. Work performed by administrators, diagnostic personnel, parents, general educators, related service personnel, and special educators must be organized to identify the changing needs of each handicapped student. Similar organization is required to insure continuously responsive specially designed instruction. When such organization exists, "participatory planning" is established.

"Cooperative use" is the third principle of the IEP as a process. Cooperative use requires that each person who interacts with the

handicapped student does so in a manner which optimizes learning. The plan developed gets used by those who teach and/or provide service(s) to the handicapped student. When instructional action is taken by those who planned it, "cooperative use" is established.

The fourth principle of the IEP as a process is "mutual supportiveness." Those who provide specially designed instruction to the handicapped student help one another. Each assists the other in accomplishing that which has been identified as important for the handicapped student. "Mutual supportiveness" is established when these conditions are met.

Its component parts best describe the IEP as a product. Present level statements, annual goals, instructional objectives, services to be provided, initiation and duration of services, monitoring procedures and evaluative criteria signal the IEP as a product.

Improvement in the quality of special education can result from implementation of the IEP as a placement tool, an instructional tool, and a planning tool. As a placement tool the IEP can be used to manage the provision of special education and/or related services in response to each handicapped student's identified special needs. Those educationally relevant special needs of a handicapped student become operationalized through statements which describe present levels of educational performance, those statements which describe annual goals, and the qualitative considerations entertained while generating such statements. For these statements to accurately represent a handicapped

student's special needs, the following requirements must be met:

1. Present level statements must be written for each area within which either "specially designed instruction" or related services is required. Such present level statements signify the kind of special education/related service required by the student.
2. An annual goal must be forecast for each present level statement.
3. Each annual goal must be forecast given the provision of <u>appropriate</u> special education/related service. Annual goal statements provide an approximation as to how much special education/related services are required.
4. Content of present level and annual goal statements is based upon accurate and inclusive evaluation data.
5. Qualitative considerations generated through analysis of evaluation data and synthesis of clinical judgements are combined with (a) those statements which signify what kind of special education/related service (present levels) is required; and, (b) how much special education/related service (annual goals) is required. They yield educationally relevant indices of a handicapped student's special needs.

Given the accuracy and inclusiveness of these student "needs" statements, the following requirements must be met so that an appropriate education is provided:

6. All appropriate special education and/or related services are reviewed in terms of responsiveness to the handicapped student's needs.
7. Maximally responsive special education and/or related services are provided.
8. The provision of such education/service is monitored and its relative impact is evaluated.
9. Programmatic adaptations are made as they are required.

Specification of student needs and selection of special education/related service consistent with the preceding requirements results in the IEP functioning as a management tool. Rhode Island regulations reflect the IEP as a management tool when they require "a statement as to how those services (provided) meet the needs identified in the evaluation report."

As an instructional tool, the individualized education program is of most relevance to service providers (i.e., teachers, speech therapists, physical therapists, etc.). Based upon accurate and inclusive student evaluation data, use of instructional materials and/or procedures may be recommended. When statements which describe present levels of educational performance are stated with accuracy, reliability, and in relevant terms, a service provider knows the level(s) at which to initiate instruction. When a service provider is convinced of the propriety and legitimacy of annual goals and quarterly instructional objectives, they become standards against which to measure the rate of student learning. So, the individualized education program can

tell service providers where to initiate instruction, provide recommendations related to procedures and materials which may be used, and present indices of anticipated student progress throughout the year.

As a planning tool, the individualized education program can be most useful to the special education administrator. For it to function as a planning tool, the following conditions are required:

1. Student need for special education/related service be accurately and precisely described.
2. Those special education/related services most responsive to a student's needs are identified by the planning and placement team. For some handicapped students those services which are "appropriate" may not be available either within the LEA or through subcontractual agreements.
3. Recommendations regarding appropriate instructional materials and appropriate instructional procedures are made by the planning and placement team. Some instructional materials may not be available; skill in some instructional procedures may not be available.
4. Indices of student performance in relation to instructional objectives and annual goals is systematically collected and concisely reported in terms of program prototype, age range of the students served, and degree of disability.
5. Decisions about the need for additional resources and/or resource allocation may be based upon data collected.

6. Decisions about the need for specialized instructional materials may be based upon data collected.
7. Decisions about the need for specific inservice education can be based upon information collected.
8. Decisions about either altering goals and objectives or influencing instructional input related to student performance may be based upon information provided.

For the IEP to function as a planning tool it must function effectively as both a placement tool and an instructional tool.

Because of its complexity as both process and product and due to the nature of the school as a system, the IEP is a difficult innovation to implement. The degree to which it is implemented varies across individuals, schools, districts and states.

Documentation for the utility of the individualized education program is available from many sources. A comprehensive review of the literature, compliance monitoring reports, a recently published national survey of IEPs, and project collected context evaluation data all lead to following conclusions. Current practices associated with IEP development and implementation provide a focus for the efforts of administrators, teachers, and parents. Current practices represent a significant improvement over former practices.

Current IEPs provide the broad framework of an instructional tool for special educators. IEPs include most of the required content, but most IEPs do not include all of the required content. IEPs are developed

by most of the required team members, but most IEPs are not developed by all of the required team members.

Internal consistency within the referral, planning, and placement process is problematic.

Internal consistency within the IEP itself suffers most from a demonstrable relationship among present level statements, instructional objectives, annual goals, and placement.

Two IEP implementation strategies are presented in Federal Special Education Regulations: compliance monitoring and a comprehensive system of personnel development. Compliance monitoring may be described as a power-coercive strategy. In general, the emphasis in power-coercive strategies is "upon political and economic sanctions in the exercise of power" and change (Chin and Benne, 1976). Adverse publicity and withholding money are the sanctions commonly employed when SEAs and LEAs are judged to be in noncompliance.

Responses by systems to the application of power-coercive strategies include the following:

"1. Coercion leads to strong efforts to avoid being coerced.

2. If resources for fighting back are available, the greater the coercion applied, the more counter aggression that is called forth.

3. If resources are not available but opportunities to escape are, the greater the tendency to leave the situation.

4. If resources for fighting back are not available, or if there are other strong incentives for staying in the situation (Material rewards or potential power), the greater the coercion

that is applied, the greater the tendency to comply with exactly those demands that are necessary to avoid being coerced.

5. If resources for fighting back and opportunities for escape are not available, the greater the tendency to dull compliance and passive resistance" (Collins, 1975).

Each of these responses has been experienced within the special education community. Though these response patterns may appear negative, many positive changes are directly related to the use of power-coercive strategies in special education. The following examples substantiate some changes effected through compliance monitoring:

"1. Approximately 12,000 pupils eliminated from Chicago Public School waiting list in two years.

2. Minnesota now allows immediate entry into impartial due process procedure.

3. All states now require multi-assessment, multi-team procedures.

4. Interagency agreements in effect in majority of states to ensure Part B requirements among all of states public agencies (e.g., Welfare, Mental Health, Correctional facilities).

5. Procedures now in effect in Michigan, Wisconsin, Illinois to insure completion of IEP prior to placement" (Blodgett, 1980).

More handicapped students are receiving special education and related services and written policies exist to guide action. These accomplishments are real and tangible.

A comprehensive system of personnel development (CSPD) may respond to quality of instruction concerns associated with P.L. 94-142 (Schofer

and Duncan, 1980). A CSPD involves all who work with handicapped students in the cohesive, unified, ongoing development of procedures, practices, and people (Gilmore, 1980). A CSPD should use supervision, consultation, inservice education, and systems level change as methods of change.

To be maximally effective, a CSPD should consciously consider the multiple work place factors which influence professional performance. If it can control for highly variable entry levels and learning rates of its participants, inservice education has positive change potential. To maximize its change potential, inservice education must get the right content to the right people at the right time(s) using the appropriate processes. The "right content, right people, and right times" for inservice education must be determined through participatory planning within the work place.

A comprehensive system of personnel development is the appropriate strategy for implementing the individualized education program as a placement tool, an instructional tool, and a planning tool. Context evaluation data provides the basis for a description of the multiple work place factors which influence performance. Context evaluation data provides the basis for identifying the right content, the appropriate instructional processes, and the right participants. Sources of data include:

1. Observation of Multidisciplinary Team (MDT) and individualized education program meetings.

2. Written referral, psychoeducational assessment, and IEP information.
3. Personal interviews with principals, school psychologists, school social workers and speech therapists.
4. Telephone interviews with parents of handicapped students.
5. Questionnaires completed by general educators at elementary and secondary levels and special educators (resource teachers and self-contained special class teachers).

Observations of MDT and IEP meetings have been conducted by a doctoral level sociologist using a modified Bales Interaction Analysis design. Leadership, interpersonal interaction roles, and problem solving are focal points of this design.

Written referral information, psychoeducational assessment reports, and IEP content are collected using checklists. A stratified representative sample of handicapped students in each school is identified. A fifty percent sample of students is selected from stratum in which fifteen or more students are located. Generally, the smaller the number of students below fifteen enrolled in a stratum the larger the proportion of students selected. All available referral information, assessment reports, and IEPs for each student are carefully reviewed and coded on checklists by trained data collectors.

A separate structured interviewed schedule is used with principals, school psychologists, school social workers, and speech therapists. Principals are interviewed individually in their schools. Group interviews are conducted with psychologists, social workers and speech

therapists. The interviewer for each of these roles is that professional who will conduct the CSPD with those (s)he is interviewing.

A structured telephone interview is conducted with parents of handicapped students. Parents of fifteen handicapped students enrolled in resource programs and fifteen students enrolled in self-contained, day, and residential programs are randomly selected.

An open ended questionnaire is sent to a random sample of fifteen general educators at the secondary level and fifteen general educators at the elementary level. Questionnaires are completed by all special education resource and self-contained class teachers. Results of each set of questionnaires are aggregated, analyzed and reported by a professional who assumes major responsibility for constructing the CSPD for each role.

Project Steering Committees are structured in each participating school district. Members of the Steering Committee include a parent of a handicapped student, a special educator, a general educator, a building level administrator (principal/assistant principal), the SPED Administrator, a central office administrator, and the project director. One member of the Steering Committee is an officer in the teachers collective bargaining unit. With this membership, Steering Committees represent a hierarchial cross of district personnel.

Context evaluation data is presented to each Steering Committee. Presentation of data occurs consistent with the following criteria:

"1. Relevant ... it relates to issues that are meaningful to the recipients.

2. Understandable ... the form language, and symbols used in feedback be familiar and understandable to the people in the organization.

3. Descriptive ... include enough real examples and illustrative material so that people can relate the information.

4. Verifiable ... presented in a manner in which the receivers can validate the findings.

5. Limited ... people have limits on the amount of information that they can receive or process at one time.

6. Impactable ... should largely concern those areas of the organization that are under the control of the receiving group.

7. Comparative ... part of the data should include data that can serve as comparison points or bench marks.

8. Unfinalized ... the formal data should serve only as a starting point for more in-depth data collection, problem identification and problem solving" (Nadler, 1977).

With some assistance and direction, Steering Committee members synthesize context evaluation data. The following decisions are made by each district Steering Committee:

1. Within which areas do performance needs exist at the system level?

2. Which practices will respond best to each performance need at the systems level?
3. Within which areas do performance needs exist at the professional/parent role level?
4. Which of the available personnel development practices will best respond to performance needs at the role level?
5. Which data should be presented to those professionals and parents who generated it?
6. How should such data be presented?

A performance need exists when actual performance falls below a minimal satisfactory level of performance. Each Steering Committee identifies the presence of performance needs at the system level and at the role level. Additionally, each Steering Committee identifies the intervention practices which will elevate systems level performance.

Each Steering Committee identifies the presence of a performance need at the role level. It identifies the optimal combination of professional development practices which will elevate performance at the role level.

At the individual professional level, related context evaluation data and selected Steering Committee recommendations are presented. Based upon these data and recommendations, each professional identifies his/her performance needs and those personnel development practices likely to be most responsive to identified needs.

The Special Education Director in each district is primarily responsible for local personnel development logistics. Acquiring time

and space for development of personnel are the major functions performed by the Special Education Director.

Content for areas requiring personnel development, personnel development staff, and instructional materials are provided by the project director. General content is identified within the context evaluation process. The professional responsible for generating specific content and personnel development practices often has been actively involved in the context evaluation. Direct experience with those professionals to participate and personnel development activities has been acquired through context evaluation activities. Collection, analysis and reporting of role related context evaluation data results in training for the personnel developer.

Systems level performance needs have been identified in many diverse areas. In one school district, referral information was not present in the designated location for fifty percent of the students; psychoeducational assessment information was not present in the designated location for approximately twenty-five percent of the students. A system for managing the collection, storage, dissemination, and flow of student information was developed and implemented in this district.

A format for reporting psychoeducational assessment information was developed in another district. This format structured the identification of those student performance areas which require specially designed instruction. IEP forms were revised to increase their internal consistency. Additionally, these IEP forms were revised to

increase the frequency and instructional usefulness of general educator-special educator interactions.

At the role level, decisions made within the IEP development and implementation process were listed. Guidelines for each professional role in relation to this sequence of decisions were reviewed and revised by the special education staff of one district. Team building activities at the school level follow these efforts toward role clarification and are scheduled for next month.

The role of the parent in the IEP development and implementation process was of particular interest to one Special Education Director. District policies were revised so as to include the parent throughout this process. A parent education program is now being developed for use in this district. This parent awareness trifold is illustrative of program content.

Workshops continue to be conducted for principals and special educators. Workshop content continues to vary in response to evolving system and role performance needs. Unfortunately, time and the focus of this paper do not permit a complete description of personnel development practices.

This data based decision making model has created energy among professionals.

Most professionals have not carefully considered IEPs and their potential uses. IEPs have resulted from Federal and State regulations; most IEPs exist because they are required. This data based decision

making model focuses attention on the current usefulness of IEPs. Its comprehensiveness and systematicness communicate the need to make greater use of IEPs. Steering Committee members are initially overwhelmed and then confused by the amount and diversity of data to which they have access. As its meanings increase in clarity, Steering Committee members become intrigued with the data. Some Steering Committee members become disenchanted with the current condtions described by the data. Most Steering Committee members meaningfully process the data and vigorously identify performance needs at the systems level. Reluctance in identifying performance needs at the role level is frequently experienced by Steering Committee members.

Energy created by eliciting information from professionals and parents is usually positive. The energy created among Steering Committee members as they revise data collection instruments, receive and process data and generate performance needs is usually positive. Typically Steering Committee members acquire confirmation for context evaluation results through conversations with their colleagues. Often systems level change activities are initiated by Steering Committee members with their colleagues.

Care must be exercised in feeding back data and Steering Committee recommendations to individual professionals. Special educators tend to feel responsible for performance which is not completely within their control. Reflections of professional performance through data feedback may be viewed as negatively evaluative. Feedback guidelines presented

earlier in this paper must be carefully followed to prevent the development of negative energy among special educators.

Assumptions about the structure of the educational system influence IEP implementation efforts. Public schools do possess unique organizational characteristics which influence the implementation of the innovations. From the view of organizations as bureaucracies, Clark (1980) poses the following as axiomatic:

1. Organizations are essentially goal attainment devices.
2. Organizations are driven and governed by rational decision making which reflects a superordinate decision making process.
3. Organizations are composed of individuals collected into units. Coupling among and within units exists.

Symbolic acts are often taken within schools consistent with these truths. Acts are symbolic because, while applicable to some bureaucracies, these truths do not apply to schools.

Most of its goals are discovered by schools. They reflect what a group of people at the time of writing goals can do. Things which can get accomplished are retained as goals. Hence a school's goals represent a written, prospective view of what it has already done.

Rational solutions to problems in schools are not reached through a scientific process of inquiry; problem solutions in schools are reached through a political process of inquiry. Schools as organizations are designed to provide only temporary solutions to problems encountered. A political process of inquiry is employed within schools because of

problematic preferences, unclear technology, and fluid participation. Individual preferences for various action alternatives are problematic because they are unknown. The technologies associated with action alternatives is not clearly understood. Many people participate in many decision making activities at various times in schools. People opt in and out of these activities with impunity. All are eager to disagree with decisions should either discomfort or an absence of logic be evident. The decision making model employed by schools is political in its need to satisfy multiple constituencies without a critical mass of individuals, actions required by decisions are not performed.

Educational organizations are lossely coupled (Weick, 1976). "Wide variation of input in the form of students and personnel is experienced by schools. The role performance of teachers is relatively invisible to other teachers or superiors. And, a low interdependence of parts exists in schools" (Johnson, 1970). In loosely coupled systems, the work of one individual does not necessarily influence the work of other individuals; what one teacher does may/may not determine what other teachers do.

Clark asserts that what is axiomatic for many bureaucracies is not established truth for schools. In fact, the truth of schools as articulated here markedly differs from the truths of other bureaucracies. Understanding of truths about schools as systems is essential to effecting educational change through personnel development practices.

Consideration of IEP implementation costs must include "the value

of benefits foregone when resources are used in one way rather than another" (Kakalik, 1978). Benefits associated with IEPs which are used as placement, instructional, and planning tools are experienced by handicapped students and the schools within which they are educated. Unless we begin to meaningfully use the individualized education program we do risk losing it. This data based implementation strategy has demonstrated its effectiveness at increasing the usefulness of the IEP.

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